

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

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LESLIE WILSON,

: Plaintiff, :

v. : Civ. No. 02-CV-4662 (BWK)

PPL ELECTRIC UTILITIES
CORPORATION,

:
Defendant.

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**MOTION FOR EXTENSION OF
TIME TO FILE DISPOSITIVE MOTIONS**

Defendant PPL Electric Utilities Corporation, by and through its attorneys, PROSKAUER ROSE LLP, hereby respectfully moves this Court for a one week extension of time to file dispositive motions in this matter. In support of this Motion, Defendant represents the following:

1. Pursuant to this Court's Order, dated April 29, 2003, dispositive motions are to filed by August 22, 2003.
2. The parties have completed discovery.
3. On August 14, 2003, Defendant's attorneys received the transcript from the court reporter for the July 18, 2003 deposition of one of its witnesses, which was conducted by Plaintiff one week after the close of discovery. The deposition testimony of this witness will be relied upon in Defendant's dispositive motion. Because we just recently received this transcript from the court reporter, and because our ability to complete the motion papers was

hampered by the power failure in New York City which shutdown our offices on August 14 and 15, we require an additional week, until August 29, 2003, to finalize our motion papers.

4. On August 15, 2003, Defendant's attorneys contacted Plaintiff's attorney, Glennis L. Clark, Esq., to obtain his consent to this motion. Plaintiff has no objection to this motion.

WHEREFORE, Defendant hereby respectfully requests an extension of seven (7) days, up to and including August 29, 2003, to file dispositive motions in this matter.

Dated: New York, New York
August 18, 2003

Respectfully submitted:
PROSKAUER ROSE LLP

By: 
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Peter P. Rahbar

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Attorneys for Defendant

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LESLIE WILSON, :
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PPL ELECTRIC UTILITIES : DECLARATION OF PETER P.
CORPORATION, : RAHBAR, ESQ.

:
Defendant.

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PETER P. RAHBAR, ESQ., declares, pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. I am associated with Proskauer Rose LLP, attorneys for Defendant PPL Electric Utilities Corporation (“PPL”) in the above-referenced matter. I make this Declaration in support of PPL’s Motion for Extension of Time to File Dispositive Motions.

2. On August 15, 2003, I contacted plaintiff’s attorney, Glennis L. Clark, to obtain his consent to this motion. He informed me that plaintiff has no objection and concurs with this motion for extension of time to file dispositive motions.

I declare, under penalty of perjury, that the foregoing is to the best of my knowledge, information and belief true and correct.

Executed on August 18, 2003
New York, New York


Peter P. Rahbar

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LESLIE WILSON,

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: Civ. No. 02-CV-4662 (BWK)

PPL ELECTRIC UTILITIES
CORPORATION,

:

Defendant.

:

PROPOSED ORDER

AND NOW, having considered motion of Defendant PPL Electric Utilities Corporation, concurred by Plaintiff, for extension of time to file dispositive motions,

The Court having been fully informed and good cause having been shown,

It is hereby ORDERED and DECREED this ____ day of August, 2003, that said Motion be GRANTED. The parties are hereby granted an extension of time of seven (7) days, up to and including August 29, 2003, to file dispositive motions.

SO ORDERED:

BRUCE W. KAUFFMAN, J.